

EXHIBIT 6

6070 Greenwood Plaza Blvd., Suite 200
Greenwood Village, Colorado 80111
Tel: 303.733.1888 Fax: 303.733.1902
www.kineticcorp.com



Forensic Engineering and Visualization

May 6, 2019

Edward Bott
Greensfelder, Hemker & Gale
10 South Broadway, Suite 2000
St. Louis, Missouri 63102

RE: *Rysta Leona Susman, et al. vs. The Goodyear Tire and Rubber Company*

Dear Mr. Bott,

As requested, Kineticcorp investigated and reconstructed a crash that occurred on May 1st, 2015 at 6:57 am on Interstate 80, approximately 2440 feet east of milepost 294 in Shelton, Nebraska. An eastbound 2003 Chevrolet Silverado, operated by Larry Blair, experienced a tire disablement event. Mr. Blair steered the Chevrolet toward the median and lost control of the vehicle. The vehicle entered the median and rolled over before coming to rest on the north side of the westbound lanes. All three passengers were ejected. Shane Loveland was seated in the center seat position and Jacob Summers was seated in the right seat position. All three passengers were injured as a result of the accident. Figure 1 is a scene photograph taken by police and depicts the vehicle at its point of rest.



Figure 1

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Figure 2 shows additional photographs taken at the scene of the accident. The police report indicated that on the day of the crash, the weather was clear and environmental conditions were not a factor.



Figure 2

Figure 3 depicts an aerial view of Interstate 80 in the area of the accident. I-80 is an east-west roadway, separated by a depressed grass median. The road has two lanes of traffic in both directions and is bounded by a white fog line, rumble strips and a 10-foot shoulder on the outer edges of the roadway. The inside edges of the roadway are bounded by a yellow lane line and a narrow asphalt shoulder with rumble strips. The speed limit in this area of I-80 is 75 mph.



Figure 3

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Summary of Conclusions

As a result of our investigation and analysis, Kineticorp reached the following conclusions related to this crash:

1. According to his testimony, Mr. Blair was operating the Chevrolet on Interstate 80, travelling eastbound.
2. According to the testimony of the driver Larry Blair, none of the occupants of the Chevrolet were belted.
3. The Chevrolet's right rear tire experienced a tire disablement event. The disablement was a partial tread separation.
4. During the disablement, the tire deposited physical evidence in the form of rubber transfer on the asphalt pavement.
5. At the start of this physical evidence, the Chevrolet was travelling at a speed of approximately 74 mph.
6. The Chevrolet was travelling approximately 78 mph, 2.5 seconds prior to depositing tire marks on the asphalt pavement.
7. According to the Crash Data Retrieval (CDR) report, Mr. Blair did not apply the brakes prior to the vehicle rolling over.
8. According to the Crash Data Retrieval (CDR) report, Mr. Blair was applying the throttle in the two seconds prior to the accident trigger event.
9. The position of the Chevrolet during the throttle application coincides with the start of the yaw evidence.
10. The vehicle yawed for approximately 290 feet across the travel lanes and into the median before rolling over.
11. The speed of the Chevrolet at the start of the rollover was approximately 39 mph.
12. The vehicle rolled approximately 115 feet through the median and westbound travel lanes before coming to rest on the north side of the roadway.
13. The Chevrolet rolled four times before coming to rest, upright on its tires.
14. The peak roll rate during the rollover was approximately 490 degrees per second (deg/s).

Basis for Conclusions: The remainder of this report describes the basis for these conclusions and outlines the procedure through which they were reached. The procedure described below utilized reliable methods, techniques and processes which conform to standard and accepted practices within the field of motor vehicle accident reconstruction. The above-listed conclusions, to which this procedure led, were reached to a reasonable degree of engineering certainty.

Procedure

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- In conducting our investigation and analysis, Kineticorp engineers reviewed and analyzed the documents and photographs listed in Appendix A.
- Kineticorp inspected, documented, photographed and digitally scanned the subject Chevrolet Silverado on October 4, 2018.
- Kineticorp inspected, documented, photographed, surveyed and digitally laser scanned the crash scene on October 31, 2018 and April 17, 2019.
- Kineticorp inspected, documented and photographed the subject tires and wheels on November 21, 2018.
- Kineticorp obtained published technical specifications for the vehicle involved in this crash.
- Kineticorp produced a computer model of the accident location using information from the police diagram as well as scan and survey data collected at the scene. Kineticorp supplemented this data by conducting photogrammetric analysis on photographs taken on the day of the crash. Photogrammetry encompasses techniques used to obtain measurements and three-dimensional data from photographs. The following technical literature describes the photogrammetric principles and techniques employed by Kineticorp. These principles and techniques are widely accepted and used within the field of accident reconstruction.
 - Baker, Kenneth S., Chapter 9: *Photogrammetry for Collision Analysis*, Traffic Collision Investigation. Evanston: Northwestern University Center for Public Safety, 2001.
 - Brach, Raymond M. Chapter 10: *Photogrammetry*, Vehicle Accident Analysis and Reconstruction Methods. Warrendale: Society of Automotive Engineers, 2005.
 - Breen, Kevin C. *Application of Photogrammetry to Accident Reconstruction*, SAE Technical Paper 861422. Warrendale: Society of Automotive Engineers, 1986.
 - Chou, C., McCoy, R., Le, J., Fenton, S. et al., *Image Analysis of Rollover Crash Tests Using Photogrammetry*, SAE Technical Paper 2006-01-0723, 2006, doi:10.4271/2006-01-0723.
 - Fenton, S. and Kerr, R., *Accident Scene Diagramming Using New Photogrammetric Technique*, SAE Technical Paper 970944, 1997, doi:10.4271/970944.
 - Fenton, S., Johnson, W., LaRocque, J., Rose, N. et al., *Using Digital Photogrammetry to Determine Vehicle Crush and Equivalent Barrier Speed (EBS)*, SAE Technical Paper 1999-01-0439, 1999, doi:10.4271/1999-01-0439.
 - Fenton, S., Neale, W., Rose, N., and Hughes, C., *Determining Crash Data Using Camera Matching Photogrammetric Technique*, SAE Technical Paper 2001-01-3313, 2001, doi:10.4271/2001-01-3313.
 - Fenton, S., Ziernicki, R., Rose, N., and Johnson, W., *Using Digital Photogrammetry to Determine Crash Severity*, Rep. London: ICrash 2000, International Crashworthiness Conference, The Royal Aeronautical Society, 2000.
 - Husher, Stein E., Michael S. Varat, and John F. Kerhoff. *Survey of Photogrammetric Methodologies for Accident Reconstruction*, Rep. Vancouver: Proceedings of the Canadian Multi-Disciplinary Road Safety Conference VII, 1991.
 - Funk, J., Beauchamp, G., Rose, N., Fenton, S. et al., *Occupant Ejection Trajectories in Rollover Crashes: Full-Scale Testing and Real World Cases*, SAE Int. J. Passeng. Cars - Mech. Syst. 1(1):43-54, 2009, doi:10.4271/2008-01-0166.
 - Neale, W., Hessel, D., and Terpstra, T., *Photogrammetric Measurement Error Associated with Lens Distortion*, SAE Technical Paper 2011-01-0286, 2011, doi:10.4271/2011-01-0286.

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- Neale, W., S. Fenton, S. McFadden, and N. A. Rose. *A Video Tracking Photogrammetry Technique to Survey Roadways for Accident Reconstruction*, SAE Technical Paper 2004-01-1221. Warrendale: Society of Automotive Engineers, 2004.
- Pepe, Michael D. *Accuracy of Three-Dimensional Photogrammetry as Established by Controlled Field Tests*, SAE Technical Paper 930662. Warrendale: Society of Automotive Engineers, 1993.
- Rose, N., Neale, W., Fenton, S., Hessel, D. et al., *A Method to Quantify Vehicle Dynamics and Deformation for Vehicle Rollover Tests Using Camera-Matching Video Analysis*, SAE Int. J. Passeng. Cars - Mech. Syst. 1(1):301-317, 2008, doi:10.4271/2008-01-0350.
- Rucoba, R., A. Duran, L. Carr, and D. Erdeljac. *A Three Dimensional Crush Measurement Methodology Using Two-Dimensional Photographs*, SAE Technical Paper 2008-01-0163. Warrendale: Society of Automotive Engineers, 2008.
- Woolley, R., White, K., Asay, A., and Bready, J., *Determination of Vehicle Crush from Two Photographs and the Use of 3D Displacement Vectors in Accident Reconstruction*, SAE Technical Paper 910118, 1991, doi:10.4271/910118.
- Our analysis of the crash relied on our own research in the area of physical evidence analysis and on other widely utilized and accepted literature related to the interpretation of physical evidence from vehicular crashes. A sampling of this literature is listed below:
 - Beauchamp, G., Hessel, D., Rose, N., Fenton, S. et al., *Determining Vehicle Steering and Braking from Yaw Mark Striations*, SAE Int. J. Passeng. Cars - Mech. Syst. 2(1):291-307, 2009, doi:10.4271/2009-01-0092.
 - Daily, John, Nathan S. Shigemura, and Jeremy Daily. *Fundamentals of Traffic Crash Reconstruction*, Jacksonville: Institute of Police Technology and Management, University of North Florida, 2006.
 - Fricke, Lynn B. *Traffic Accident Reconstruction*, Evanston, IL: Northwestern University Traffic Institute, 1990.
 - Fricke, Lynn B. *Traffic Crash Reconstruction, 2nd Edition*, Evanston, IL: Northwestern University Traffic Institute, 2010.
 - Reveley, Mary S. *A Comparison Study of Skid and Yaw Marks*, SAE Technical Paper 890635. Warrendale: Society of Automotive Engineers, 1989.
- Kineticorp analyzed the event data from the subject Chevrolet. The airbag control module from this vehicle was capable of recording crash related data and is supported by the Crash Data Retrieval (CDR) system. This data was analyzed using techniques recommended in the CDR Data Analyst Certification Course and experience gained from the CDR User's Conferences. Additionally, Kineticorp relied upon our own published literature pertaining to CDR analysis. A sample of these publications is listed below:
 - Bare, Cleve, Brian Everest, Donald Floyd, and Douglas Nunan. *Analysis of Pre-Crash Data Transferred over the Serial Data Bus and Utilized by the SDM-DS Module*, SAE Technical Paper 2011-01-0809. Warrendale: Society of Automotive Engineers, 2011.
 - Bortles, W., Biever, W., Carter, N., and Smith, C., *A Compendium of Passenger Vehicle Event Data Recorder Literature and Analysis of Validation Studies*, SAE Technical Paper 2016-01-1497, 2016, <https://doi.org/10.4271/2016-01-1497>.
 - Bortles, W., Koch, D., Beauchamp, G., Pentecost, D. et al., "Event Data Recorder Performance during High Speed Yaw Testing Subsequent to a Simulated Tire Tread Separation Event," SAE Technical Paper 2019-01-0634, 2019, doi:10.4271/2019-01-0634.
 - Gabler, H. Clay, John Hinch, and John Steiner. *Event Data Recorders - A Decade of Innovation*, Rep. no. PT-139. Warrendale: Society of Automotive Engineers, 2008.
 - Ishikawa, Hirotooshi, et al. *Study on Pre-Crash and Post-Crash Information Recorded in Electronic Control Units (ECUS) Including Event Data Recorders*, Japan, Paper Number 09-0375.

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- Lawrence, Jonathan M., Craig C. Wilkinson, David J. King, Bradley E. Heinrichs, and Gunter P. Siegmunds. *The Accuracy and Sensitivity of Event Data Recorders in Low-Speed Collisions*, SAE Technical Paper 2002-01-0679. Warrendale: Society of Automotive Engineers, 2002.
- Lawrence, Jonathan M., and Craig C. Wilkinson. *The Accuracy of Crash Data from Ford Restraint Control Modules Interpreted with Revised Vetronix Software*, SAE Technical Paper 2005-01-1206. Warrendale: Society of Automotive Engineers, 2005.
- Niehoff, Peter. *Evaluation of Event Data Recorders in Full Systems Crash Tests*, Rep. no. 05-0271. Washington D.C.: National Highway Traffic Safety Administration.
- Steiner, John C. *Event Data Recorder Pre-Crash Data Sources for General Motors Vehicles*, Rep. no. IMECE2003-41812. American Society of Mechanical Engineers International Mechanical Engineering Congress & Exposition, 2003.
- Wilkinson, Craig C. *The Accuracy and Sensitivity of 2003 and 2004 General Motors Event Data Recorders in Low-Speed Barrier and Vehicle Collisions*, SAE Technical Paper 2005-01-1190. Warrendale: Society of Automotive Engineers, 2005.
- Kineticorp analyzed the rollover sequence and calculated the roll velocity and translational velocity of the vehicle. This analysis relied upon our own research of rollover accidents along with the following publications:
 - Arndt, Mark W., et al. *Drag Factors from Rollover Crash Testing For Crash Reconstructions*, Rep. no. IMECE2011-65537. American Society of Mechanical Engineers International Mechanical Engineering Congress & Exposition, 2011.
 - Arndt, Mark W., et al. *Comparison of Linear Variable Deceleration Rate Rollover Reconstruction to Steer-Induced Rollover Tests*, SAE Technical Paper 2012-01-0469. Warrendale: SAE International, 2012.
 - Asay, Alan F. et al. *Rollover Testing of Sport Utility Vehicles (SUVs) on an Actual Highway*, SAE Technical Paper 2010-01-0521. Warrendale: Society of Automotive Engineers, 2010.
 - Carter, Jarrod W. et al. *Rollover Dynamics: An Exploration of the Fundamentals*, SAE Technical Paper 2008-01-0172. Warrendale: Society of Automotive Engineers, 2008.
 - Chou, Clifford C., Fenton Stephen J. et al. *Image Analysis of Rollover Crash Tests Using Photogrammetry*, SAE Technical Paper 2006-01-0723. Warrendale: Society of Automotive Engineers, 2006.
 - Funk, James R., *Trajectory Model of Occupants Ejected in Rollover Crashes*, SAE Technical Paper 2007-01-0742. Warrendale: Society of Automotive Engineers, 2007.
 - Funk, James R., Beauchamp, Gray, Rose, Nathan A., Fenton, Stephen J. *Occupant Ejection Trajectories in Rollover Crashes: Full-Scale Testing and Real World Cases*, SAE Technical Paper 2008-01-0166. Warrendale: Society of Automotive Engineers, 2008.
 - Koch, D., Beauchamp, G., and Pentecost, D., *Deceleration Rates of Vehicles with Disabled Tires*, SAE Technical Paper 2017-01-1427, 2017.
 - Luepke, Peter, et al. *An Evaluation of Laminated Side Window Glass Performance During Rollover*, SAE Technical Paper 2007-01-0367. Warrendale: Society of Automotive Engineers, 2007.
 - Rose, Nathan A., Beauchamp, Gray, Fenton, Stephen J. *Factors Influencing Roof-to-Ground Impact Severity: Video Analysis and Analytical Modeling*, SAE Technical Paper 2007-01-0726. Warrendale: Society of Automotive Engineers, 2007.
 - Rose, Nathan A., Beauchamp, Gray, Fenton, Stephen J. *Analysis of Vehicle-to-Ground Impacts during a Rollover with an Impulse-Momentum Impact Model*, SAE Technical Paper 2008-01-0178. Warrendale: Society of Automotive Engineers, 2008.
 - Rose, Nathan A. Beauchamp, Gray, Fenton, Stephen J. *The Influence of Vehicle-to-Ground Impact Conditions on Rollover Dynamics and Severity*, SAE Technical Paper 2008-01-0194. Warrendale: Society of Automotive Engineers, 2008.
 - Rose, Nathan A., and Gray Beauchamp. *Development of a Variable Deceleration Rate Approach to Rollover Crash Reconstruction*, SAE

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Technical Paper 2009-01-0093. Warrendale: Society of Automotive Engineers, 2009.

- Rose, Nathan A., and Gray Beauchamp. *Analysis of a Dolly Rollover with PC-Crash*, SAE Technical Paper 2009-01-0822. Warrendale: Society of Automotive Engineers, 2009.
 - Rose, Nathan A., and Gray Beauchamp. *A Variable Deceleration Approach to Rollover Crash Reconstruction*, *Collision Magazine*, Vol. V, Issue I, Spring 2010.
 - Stevens, Don C., Stephen Arndt, Leda Wayne, Mark Arndt, Robert Anderson, Joseph Manning, and Russell Anderson. *Rollover Crash Test Results: Steer-Induced Rollovers*, SAE Technical Paper 2011-01-1114. Warrendale: Society of Automotive Engineers, 2011.
- In addition to physical evidence, principles of physics, and the listed technical literature, KinetiCorp engineers also relied on their experience, education and training.

Chevrolet: The vehicle involved in this accident is a 2003 Silverado (VIN - 1GCEC14X33Z115363). This vehicle is a regular cab, long bed truck and is equipped with a 4.3-liter, 6-cylinder gasoline engine. Figure 4 contains photographs of the Chevrolet taken by KinetiCorp during our inspection. As seen in the photographs, the vehicle exhibits damage consistent with a rollover event. During our inspection, KinetiCorp used a FARO laser scanner to create a 3-dimensional model of the damaged Chevrolet. The scanner captured millions of data points and allowed KinetiCorp to make accurate measurements in a three-dimensional, computer environment. Figure 5 depicts a sampling of the scan data. At the time of our inspection, the subject tires and wheels were not with the vehicle. KinetiCorp had an opportunity to inspect these tires and wheels at a later date. Figure 6 contains a sample of the photographs taken during this inspection and depicts the subject, right-rear tire.

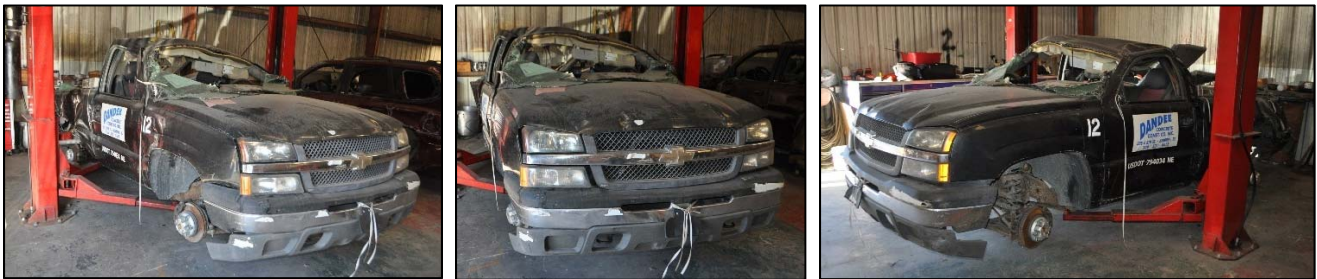


Figure 4



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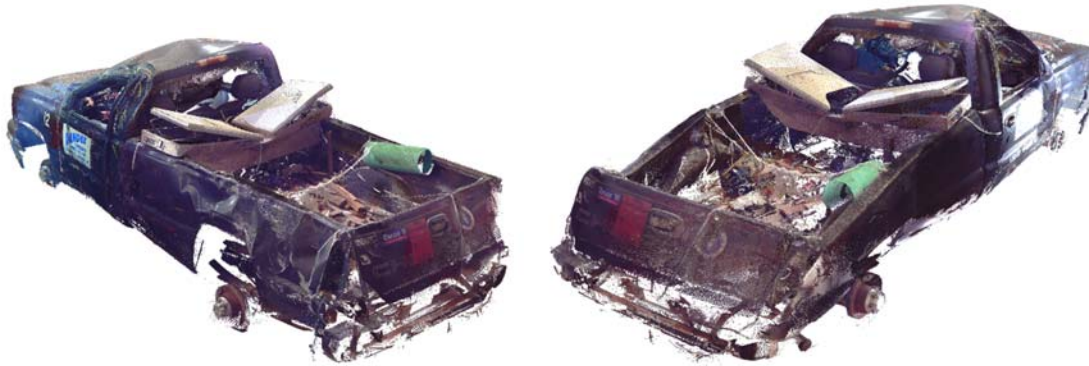


Figure 5



Figure 6

Accident Scene and Diagram: KinetiCorp created a scene diagram using the information gathered during our inspection. KinetiCorp supplemented this information by conducting photogrammetric analysis on scene photographs taken on the day of the crash. Photogrammetry is the process of obtaining three-dimensional measurements and positional data from photographs. The photogrammetric technique that KinetiCorp used in this case is referred to as camera-matching photogrammetry. This technique involves the following steps:

- (1) Computer-modeling software was used to create a three-dimensional computer model of the crash scene from data that was collected with scanning equipment. This computer model includes features of the environment that were present at the time of the accident such as road boundaries, roadway stripes, fence posts and other unique aspects of the roadway and surrounding environment.
- (2) The computer-modeled environment was then imported into a modeling software package and a number of computer-modeled cameras was set up to view the computer environment from perspectives that are similar to those characterized in the photographs taken shortly after the accident.
- (3) Each of the accident scene photographs that are to be analyzed were imported into the modeling software and each was designated as a background image for the corresponding computer-modeled camera with the same perspective.
- (4) Adjustments to the location, focal length and target location of the computer-modeled camera were made until there was an overlay between the computer-generated environment model and the environment shown in the photograph.

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(5) Once the camera location and characteristics were determined and the overlay between the environment model and the photograph was obtained, non-permanent features such as physical evidence on the roadway was mapped from the photograph onto the environment model. Once these non-permanent features were transferred to the environment model, they were measured relative to the known dimensions of the environment model.

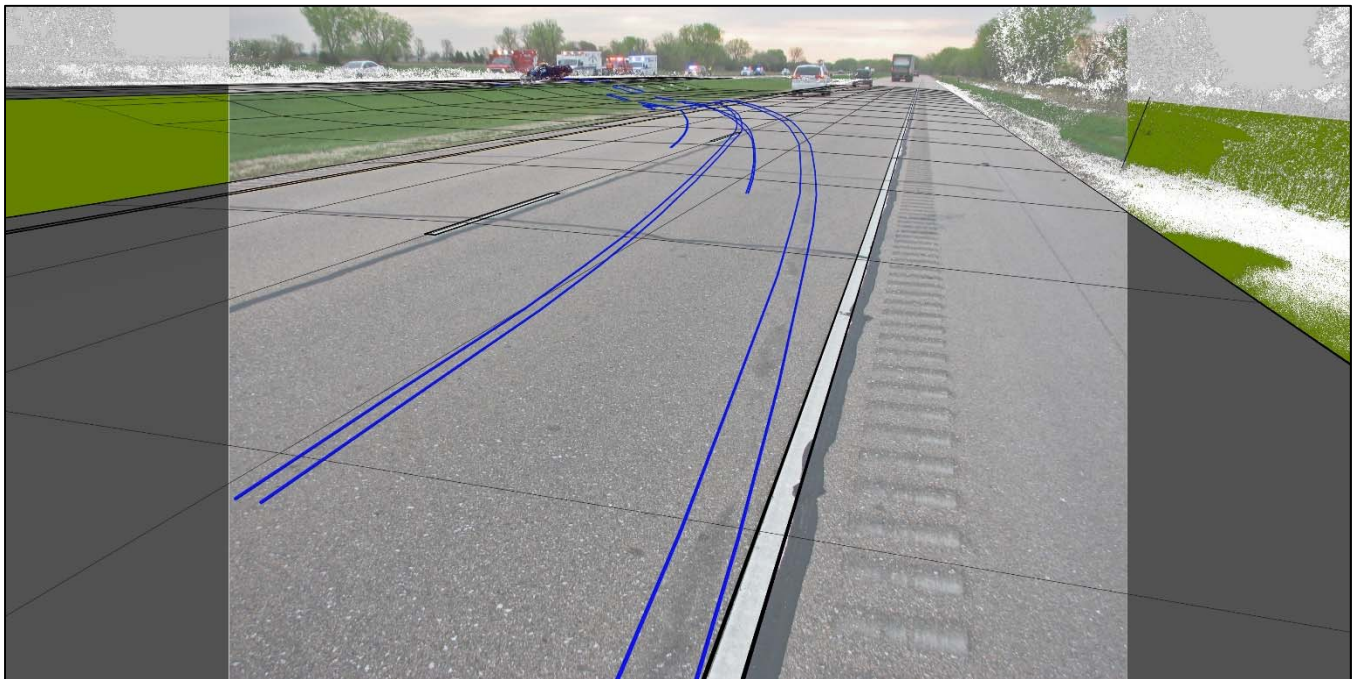
Figure 7 depicts a sampling of our photogrammetric analysis. The first image is the original photograph that was camera-matched. In the second image, the photograph was aligned with the scan and survey data which can be seen as point cloud and an overlay of lines. In the third image, the vehicle scan data has been aligned with the vehicle seen in the photograph and the evidence has been traced. In the fourth image of the figure, the photograph has been removed leaving the modeled environment, complete with the vehicle rest position and physical evidence. This modeled environment was used to create our scene diagram which is shown in Figure 8. The scene diagram shows the Chevrolet at rest along with the physical evidence traced.



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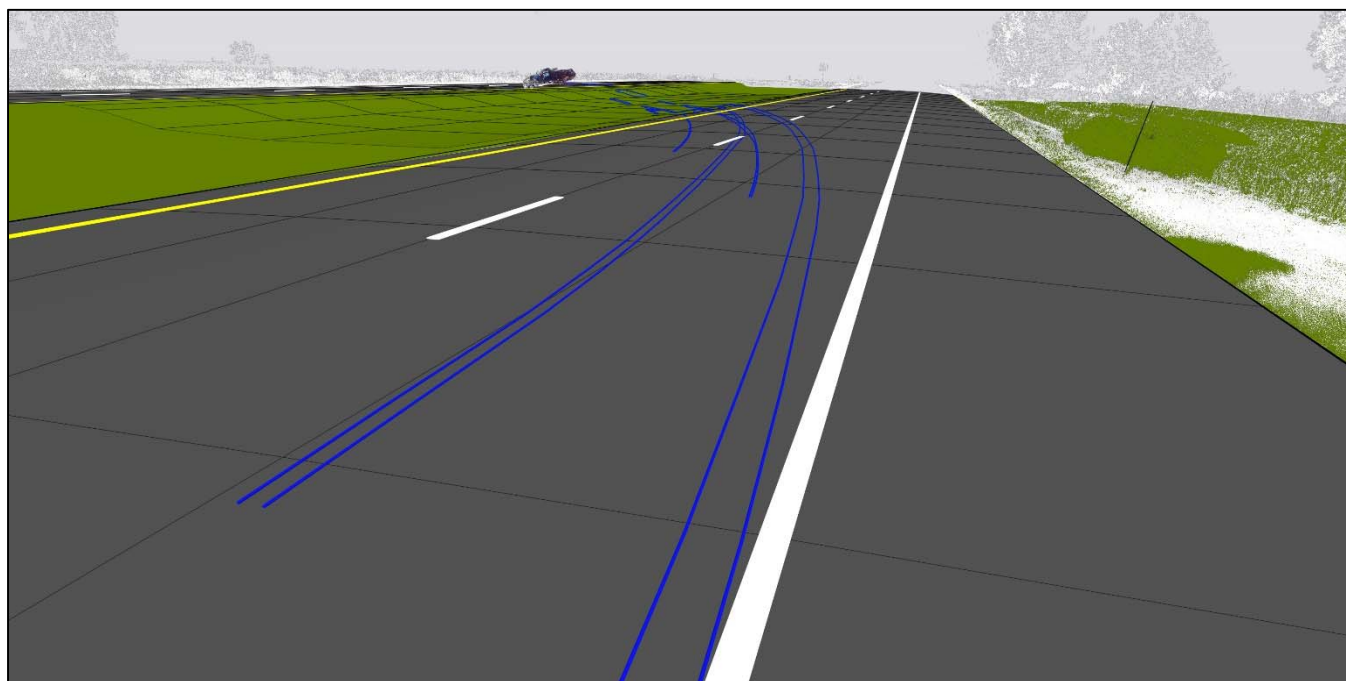


Figure 7



Figure 8

Sequence Analysis: Kineticorp analyzed the motion of the vehicle through the physical evidence using the scene diagram. Figure 9 shows the sequence diagram. Prior to loss of control, the Chevrolet was heading east on I-80. The right-rear tire experienced a tire disablement and deposited tire mark evidence that began on the shoulder just outside of the fog line. The start of this evidence corresponds with Position #1 in Figure 9. Mr. Blair steered the vehicle to the left causing the Chevrolet to yaw counterclockwise and head toward the median. The vehicle continued into the median where it began to roll, passenger side leading, as depicted by Position #2 of the figure. The Chevrolet rolled over four times before coming to rest on the north side of the roadway as indicated by Position #3.

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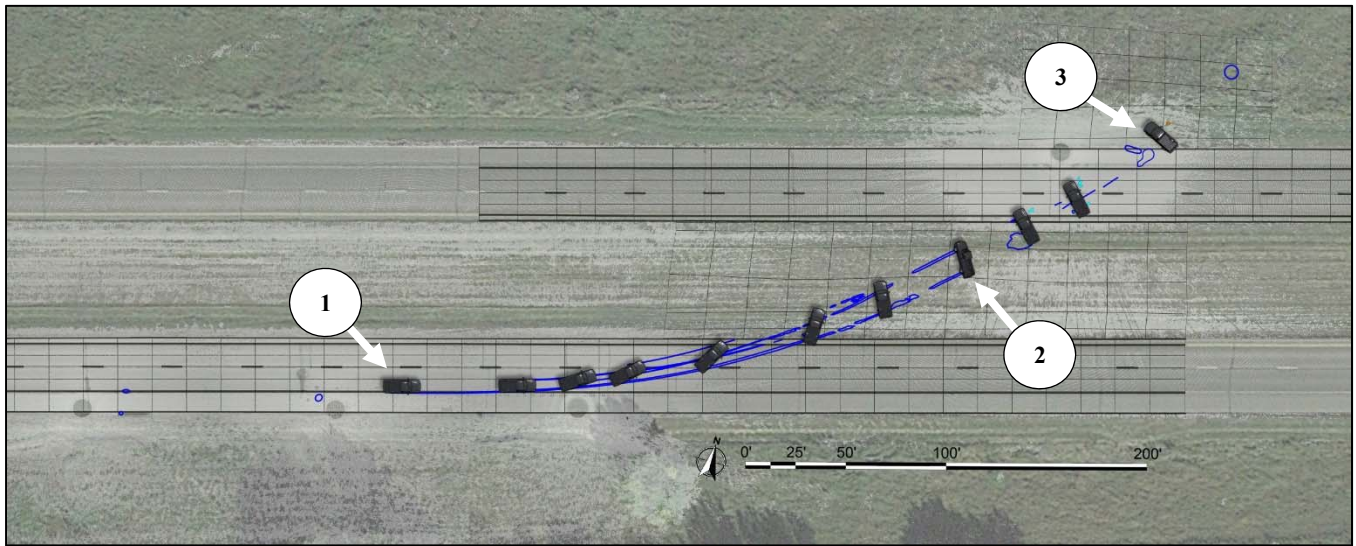


Figure 9

Roll Analysis: KinetiCorp analyzed the rollover damage seen on the Chevrolet. Figure 10 depicts the scanned images of the Chevrolet. During our inspection, KinetiCorp engineers identified the scratch patterns on the surface of the vehicle. The scratch patterns were analyzed to determine the minimum rolls that occurred during the event. In Figure 10, each colored line indicates a scratch that occurred during a roll. Marks of the same family are outlined in the same color. As seen in the figure, there are four different colored marks, indicating a minimum of four rolls.



Figure 10

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Speed Analysis: Kineticorp reconstructed this crash using the principles of conservation of energy. Based on our conservation of energy analysis, it was determined that the Silverado was travelling approximately 74 mph at the start of the physical evidence (Position 1 in Figure 9 above).

Kineticorp also analyzed the data provided in the CDR report. The specified tires for this Chevrolet are 255/70R16. At the time of the accident, the vehicle was equipped with larger, 235/85R16 tires. This discrepancy in tire size caused the event data recorder to underreport the speeds in the CDR data. Our analysis of the CDR data accounts for this difference in tire size and accurately adjusts the speeds based on the vehicle's tires at the time of the accident. Based on this analysis, the Chevrolet was travelling at 78 mph at the start of the recorded data. Kineticorp also conducted a drivetrain analysis. The initial speed of the Chevrolet was calculated using the CDR-reported engine revolutions and the vehicle's equipped gear ratios and tire size. This analysis also concluded that the vehicle was travelling approximately 78 mph at the start of the recorded data.

Kineticorp adjusted the calculated speeds to account for the yaw angle of the Chevrolet. The CDR data reports the effective wheel speed of the Chevrolet. The adjustment was made to convert the over-the ground speed determined by our analysis to a wheel speed (longitudinal speed) so that our analysis could be directly compared to the CDR data. The red line in Figure 11 depicts Kineticorp's adjusted speed analysis using the principle of the conservation of energy and depicts the yaw-adjusted speeds from the start of the physical evidence up to the point of rollover. The yellow line in the figure shows the CDR speeds adjusted for tire size and the blue line depicts the speeds determined using the drivetrain analysis.

The difference between the drivetrain analysis (shown in blue) and the tire adjusted speeds (shown in yellow) can be explained by wheel slip. All three methods of analysis align at the last time step prior to Algorithm Enable (AE or triggering event). Utilizing this alignment, it was determined that the Chevrolet was travelling at 78 mph, approximately 2.5 seconds prior to depositing tire marks on the pavement. Algorithm enable could have occurred up to one second after the last known value on the CDR report. The trigger event would have occurred approximately when the Silverado entered the median.

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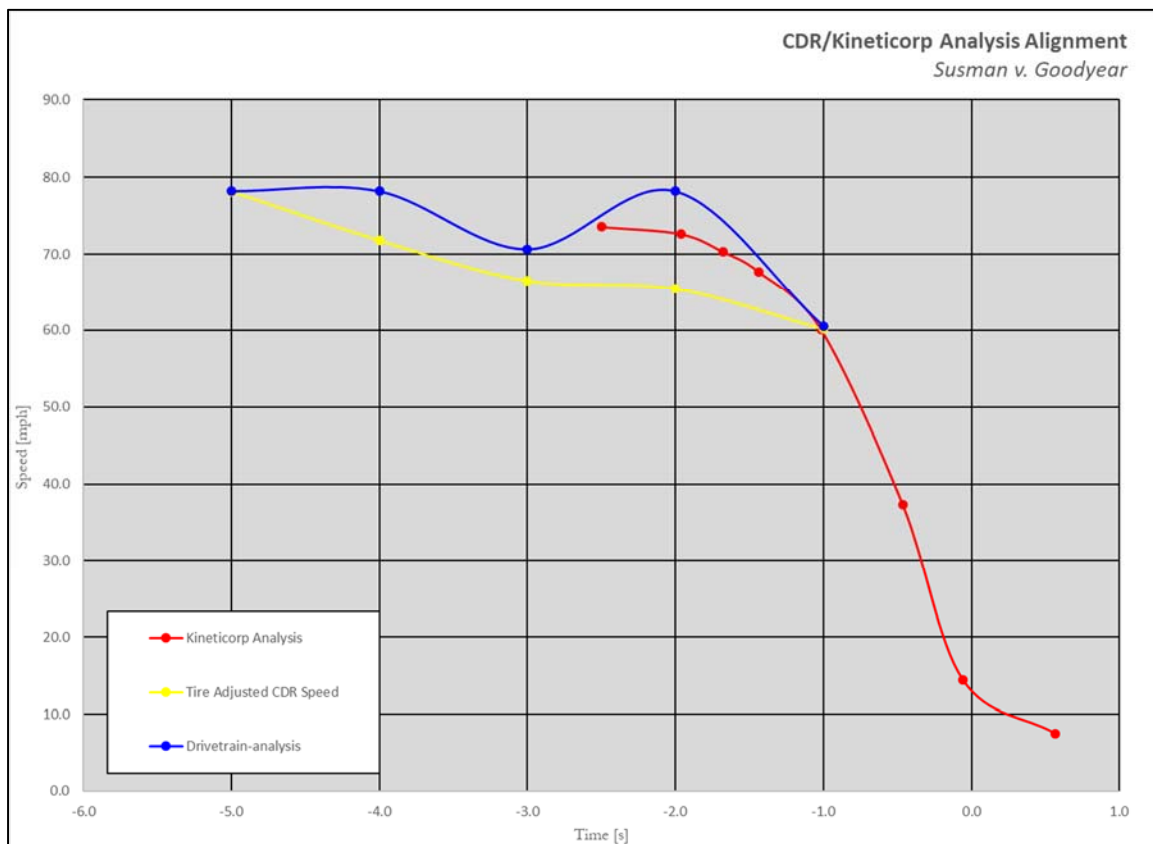


Figure 11

Throttle Data: Table 1 below contains some of the pre-event data contained in the Bosch CDR report. This data encompasses the 5 second period prior to the triggering event. The data is recorded asynchronously – this means that the information listed at a time stamp could have been recorded within one interval prior. For example: The Vehicle Speed indicated at -4 seconds is listed as 68 mph. However, this data could have been collected at any fraction of time between -5 and -4 seconds. Similarly, the Percent Throttle at -2 seconds indicates that the throttle body was opened to 41% sometime between -3 and -2 seconds indicating that Mr. Blair pressed the accelerator as early as 3 seconds prior to the trigger event.

Table 1 - Data from CDR report.

Seconds Before AE	Vehicle Speed (MPH)	Engine Speed (RPM)	Percent Throttle
-5	74	1984	36
-4	68	1984	0
-3	63	1792	0
-2	62	1984	41
-1	57	1536	69

Having aligned the CDR data with the rollover sequence and physical evidence as shown in Figure 11, Kineticorp determined the area on the roadway where Mr. Blair began applying the throttle between -3 and -2 seconds. Figure 12 depicts the sequence diagram with a red arrow indicating a position at approximately the -2 second mark from the CDR data. The throttle was being applied at, or before this point in the sequence. This point coincides with the start of the yaw mark evidence.

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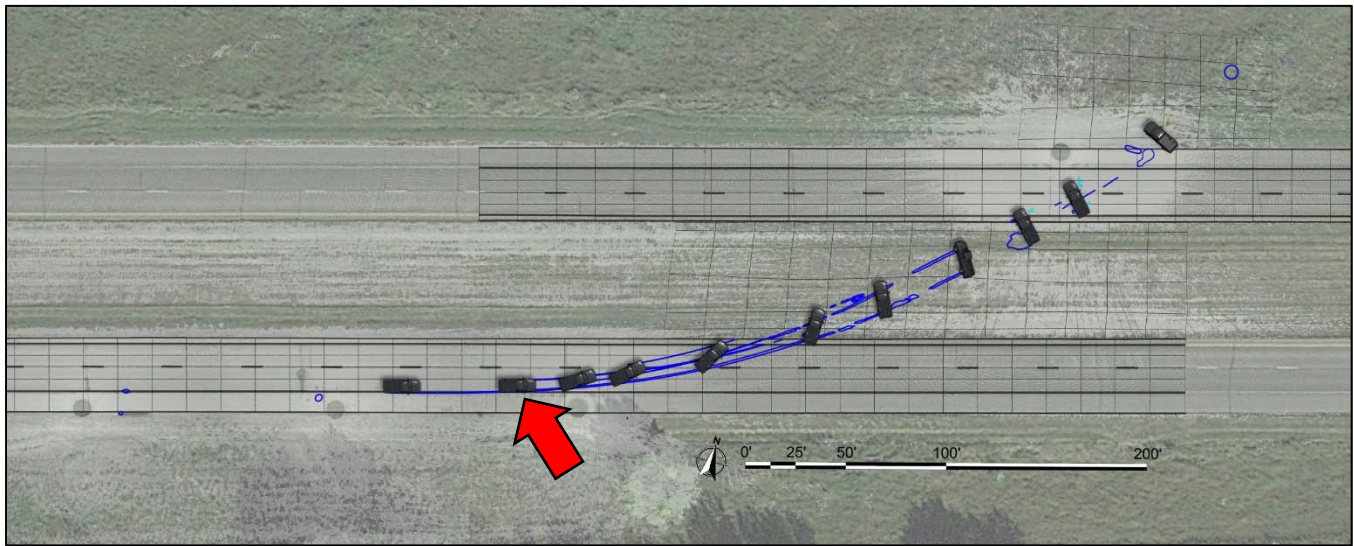


Figure 12

As part of our conservation of energy analysis, Kineticorp analyzed the rollover portion of this crash. Figure 13 depicts a plot of the roll (red) and translational velocities during the roll sequence. As can be seen in the figure, the Chevrolet experienced a peak roll velocity of approximately 490 degrees per second.

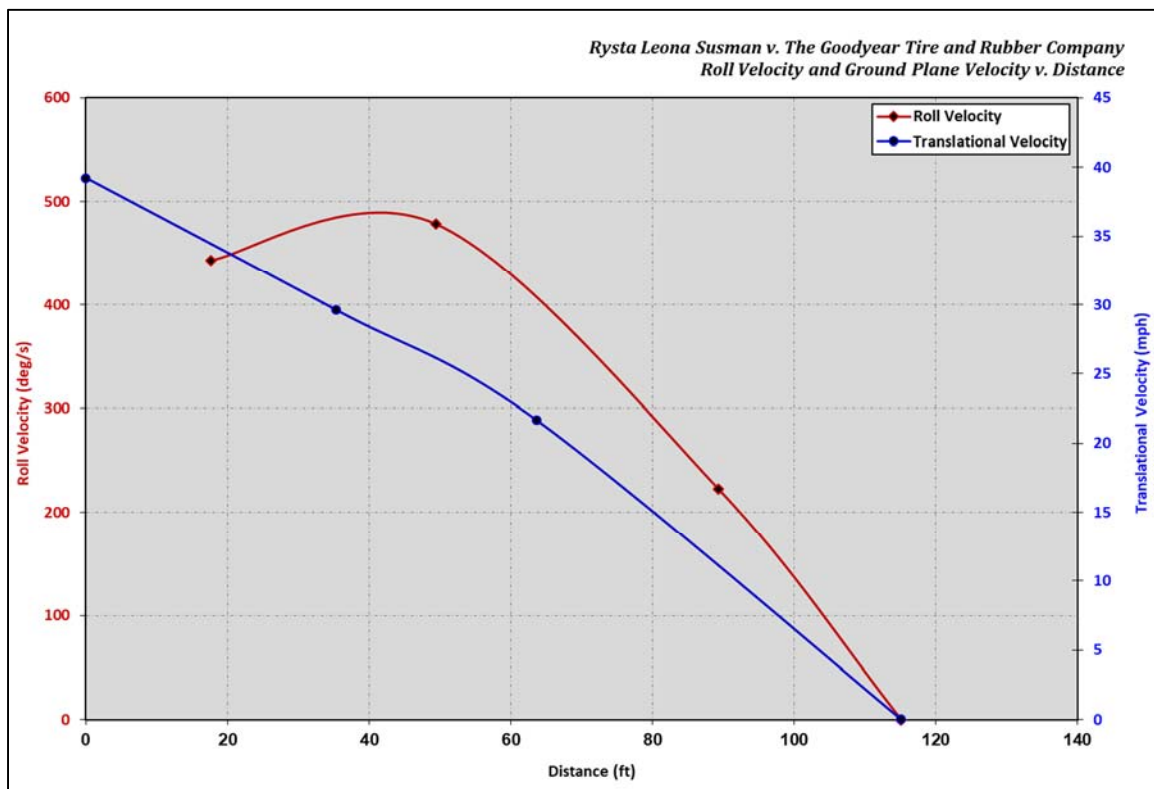


Figure 13

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Kineticorp used the results of our analysis to create an interactive motion file using 3DS MAX, a three-dimensional modeling software package. This file shows the motion of the vehicle from various perspectives and allows the user to move the vehicle through the physical evidence in the modeled environment. Figure 14 depicts a screen grab from the motion file and shows some of the possible perspectives. As can be seen in the figure, the vehicle tires and tire mark evidence has been traced in various colors. Each color tire mark coincides with the similarly colored tire. The tire that underwent a tread separation is indicated in blue.

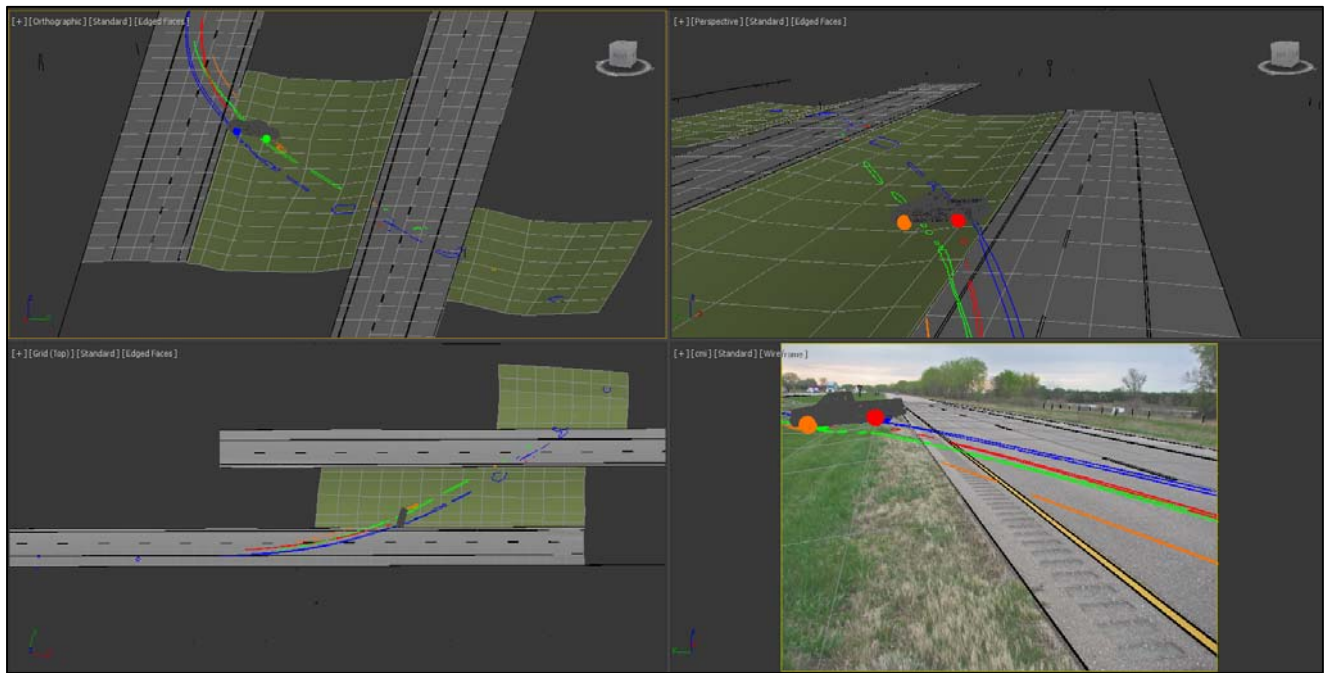


Figure 14

Closing: The opinions and conclusions expressed in this report were reached to a reasonable degree of engineering certainty based on our investigation and analysis to date. Further information, data, investigation or analysis may lead us to revise or supplement these opinions and conclusions. Kineticorp may produce additional materials including graphics, animations or other demonstratives for use at deposition and trial.

Sincerely,

Stephen J. Fenton, P.E.
Principal Engineer



Dana E. Thornton, BSME
Senior Forensic Engineer



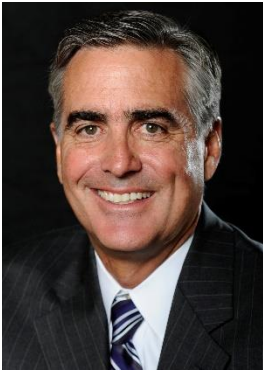
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Appendix A
List of Provided Documents
Susman v Goodyear

- **Police**
 - State of Nebraska, Investigator's Motor Vehicle Accident Report
 - Nebraska State Patrol Incident Report
 - Police Overlay
 - Call History
- **Photographs**
 - Accident Scene Photos - 35 images
 - Nebraska State Patrol Photos - 27 images
 - FBL Financial Photos – 24 images
- **Deposition Transcripts (*with Exhibits**)**
 - Daniel Bueser, Dated October 23, 2018
 - Jacob Summers, Dated October 24, 2018
 - Larry Blair, incl Video Deposition, Dated February 7, 2019
 - Micky Gilbert, Dated April 16, 2019 *
 - Jacob Summers, incl Video Deposition, Dated October 24, 2018
- **Expert Reports**
 - Micky Gilbert Expert Report, Dated March 12, 2019
 - Micky Gilbert Expert File Materials - 5,247 files, 243 folders
- **Legal Documents**
 - Complaint
- **Other Documents**
 - CDR Data: VIN# 1GCEC14X33Z115363
 - FBL Financial Docs – File Notes Caption Report (4)
 - Larry Blair, Good Samaritan Hospital, Discharge Summary
 - Shane Loveland, Alcohol Analysis
 - Shane Loveland, Negative Urine Drug Screen Analysis
 - Jacob Summers, Good Samaritan Hospital, History & Physical Forms
 - Jacob Summers, UNMC Nebraska Medicine, Lab Orders and Results
 - Dandee Concrete Construction Company Documents
 - Kearney Towing and Repair Documents
 - Jacob Summers, Alcohol Analysis



Résumé of
STEPHEN J. FENTON, P.E.

Kineticcorp™

6070 Greenwood Plaza Blvd., Suite 200
Greenwood Village, Colorado 80111
Tel: 303.733.1888
Fax: 303.733.1902
sfenton@kineticcorp.com

EXPERIENCE:

- President and Principal Engineer, Kineticcorp, LLC, 2005 to Present
- Vice President, Principal Engineer, and Senior Engineer, Knott Laboratory, Inc., Denver, Colorado 1995 to 2005
- President, Fenton/Kerr Engineering, Inc., Denver, Colorado, 1993 to 1997
- Area Manager, Peter Kiewit Sons', Inc., Omaha, Nebraska, 1990 to 1993
- Project Engineer and Superintendent, Twin Mountain Rock Company, Albuquerque, New Mexico, 1987 to 1990
- Field Engineer, Kiewit Western Company, Denver, Colorado 1983 to 1987

REGISTRATIONS: Mr. Fenton is registered as a Professional Engineer in the State of Colorado. He is a fully accredited Traffic Accident Reconstructionist through the Accreditation Commission for Traffic Accident Reconstruction (ACTAR).

EDUCATION: **B.S., Engineering**, Civil Specialty, Colorado School of Mines, Golden, Colorado, 1987.

AWARDS: Mr. Fenton was a co-author on a paper that received the [2006 Arch T. Colwell Merit Award](#) from the Society of Automotive Engineers. This award recognizes authors of outstanding papers presented at SAE meetings. Papers are judged for their value as contributions to existing knowledge of mobility engineering.

FORENSIC ENGINEERING: Mr. Fenton investigates and reconstructs vehicular accidents and provides expert testimony in State and Federal courts for both defendants and plaintiffs. In the course of his work as a forensic engineer, Mr. Fenton actively participates in the accident reconstruction community.

- Mr. Fenton chaired the Photogrammetry Committee for the Society of Automotive Engineers (SAE) from 2001 to 2012, and participated as a team member in the Accident Investigation and Accident Reconstruction Standards Committee (AIARSC). As a part of the AIARSC, he participated in the following subcommittees: Investigation Techniques, Vehicle Road Friction, Reconstruction Analysis, Information Resources, and Motor Vehicle Fire Investigations Task Force. Through his involvement with these committees, Mr. Fenton participated in establishing professional guidelines and protocols for accident investigation and reconstruction.
- Mr. Fenton has conducted accident investigations as a team member for the National Highway Traffic Safety Administration's (NHTSA) Crash Injury Research and Engineering Network (CIREN), which teams engineers with doctors to gather real-world crash data and to evaluate occupant injuries.
- Mr. Fenton has given presentations and lectures at a number of national and international technical conferences, including the Society of Automotive Engineer's World Congress and Northeastern University's *Symposium on Criminal Justice*. He conducts seminars for regional bar associations and engineering societies on photogrammetry and vehicular accident reconstruction.
- Mr. Fenton has authored numerous technical articles in the areas of accident reconstruction, photogrammetry, and computer animation, which have been published in the SAE's *Technical Paper Series*, *Accident Reconstruction Journal*, and the *National Academy of Forensic Engineers*.
- Mr. Fenton has been awarded grants related to photogrammetric documentation and has been listed as a training specialist for close-range photogrammetry software.
- Mr. Fenton's accident reconstruction expertise has been featured on such television programs as MSNBC's "Why Cars Crash," Discovery Channel's "Discover Magazine – The Science behind the Headlines" and NBC's News Magazine "Dateline."

PROFESSIONAL AFFILIATIONS:

- Society of Automotive Engineers (SAE), Member
- ASCE (American Society of Civil Engineers), Member
- SPIE (The International Society for Optical Engineering), Member
- ASPRS (American Society of Photogrammetry and Remote Sensing), Member

Stephen J. Fenton, P.E.
President and Principal Engineer



Denver:

6070 Greenwood Plaza Blvd., Suite 200
Greenwood Village, Colorado 80111
Tel: 303.733.1888
Fax: 303.733.1902

Publications

1. Beauchamp, Gray, Hessel, David, Rose, Nathan A., **Fenton, Stephen J.**, "[Determining Steering and Braking Levels from Yaw Mark Striations](#)," Paper Number 2009-01-0092, Society of Automotive Engineers, 2009, published in the *SAE International Journal of Passenger Cars – Mechanical Systems*.
2. Rose, Nathan A., Beauchamp, Gray, **Fenton, Stephen J.**, "[The Influence of Vehicle-to-Ground Impact Conditions on Rollover Dynamics and Severity](#)," Paper Number 2008-01-0194, Society of Automotive Engineers, 2008.
3. Rose, Nathan A., **Fenton, Stephen J.**, Beauchamp, Gray, "[Analysis of Vehicle-to-Ground Impacts during a Rollover with an Impulse-Momentum Impact Model](#)," Paper Number 2008-01-0178, Society of Automotive Engineers, 2008.
4. Rose, Nathan A., Neale, W.T.C., **Fenton, Stephen J.**, Hessel, D., McCoy, R.W., Chou, C.C., "[A Method to Quantify Vehicle Dynamics and Deformation for Vehicle Rollover Tests Using Camera-Matching Video Analysis](#)," Paper Number 2008-01-0350, Society of Automotive Engineers, 2008.
5. Funk, J. R., Beauchamp, G., Rose, Nathan A., **Fenton, Stephen J.**, Pierce, J., "[Occupant Ejection Trajectories in Rollover Crashes: Full-Scale Testing and Real World Cases](#)," Paper Number 2008-01-0166, Society of Automotive Engineers, 2008.
6. Rose, Nathan A., Beauchamp, Gray, **Fenton, Stephen J.**, "[Factors Influencing Roof-to-Ground Impact Severity: Video Analysis and Analytical Modeling](#)," 2007-01-0726, Society of Automotive Engineers, 2007.
7. Rose, Nathan A., **Fenton, Stephen J.**, Beauchamp, Gray, "[Restitution Modeling for Crush Analysis: Theory and Validation](#)," 2006-01-0908, Society of Automotive Engineers, 2006.
8. Chou, C., McCoy, R., **Fenton, Stephen J.**, Neale, W., Rose, Nathan, "[Image Analysis of Rollover Crash Test Using Photogrammetry](#)," 2006-01-0723, Society of Automotive Engineers, 2006. This paper received the **2006 Arch T. Colwell Merit Award**, which was established by Arch Colwell to recognize authors of outstanding papers presented at SAE meetings. Papers are judged for their value as contributions to existing knowledge of mobility engineering, and primarily with respect to their value as an original contribution to the subject matter.
9. **Fenton, Stephen J.**, "Using Photogrammetric Animations to Effectively Present Your Accident Reconstruction to the Jury," American Bar Association (ABA), 2006
10. Rose, Nathan A., **Fenton, Stephen J.**, "[Crush and Conservation of Energy Analysis: Toward a Consistent Methodology](#)," 2005-01-1200, Society of Automotive Engineers, Warrendale, PA, 2005.
11. Neale, W., **Fenton, Stephen J.**, McFadden, S., Rose, Nathan, "[A Video Tracking Photogrammetry Technique To Survey Roadways for Accident Reconstruction](#)," 2004-01-1221, Society of Automotive Engineers, Warrendale, PA, 2004.
12. Rose, Nathan A., **Fenton, Stephen J.**, "[An Examination of the CRASH3 Effective Mass Concept](#)," 2004-01-1181, Society of Automotive Engineers, Warrendale, PA, 2004.
13. Rose, Nathan A., **Fenton, Stephen J.**, Hughes, Christopher M., "[Integrating Monte Carlo Simulation, Momentum-Based Impact Modeling, and Restitution Data to Analyze Crash Severity](#)," 2001-01-3347, Society of Automotive Engineers, Warrendale, PA, 2001.
14. **Fenton, Stephen J.**, Neale, William, Rose, Nathan A., Hughes, Christopher, "[Determining Crash Data Using Camera-Matching Photogrammetric Technique](#)," 2001-01-3313, Society of Automotive Engineers, Warrendale, PA, 2001.

15. **Fenton, Stephen**, Rose, Nathan A., Johnson, Wendy, "[Using Digital Photogrammetry to Determine Crash Severity](#)," Proceedings of the International Crashworthiness Conference, September 2000.
16. **Fenton, Stephen J.**, "Forensic Engineering Comparison of Two & Three Dimensional Photogrammetric Accident Analysis," *National Academy of Forensic Engineering* (NAFE), REF:308S, Photogrammetric Accident Analysis.
17. **Fenton, Stephen J.**, Johnson, Wendy, LaRocque, Jaime, Rose, Nathan A., "[Using Digital Photogrammetry to Determine Vehicle Crush and Equivalent Barrier Speed](#)," 1999-01-0439, Society of Automotive Engineers, Inc., Warrendale, PA, 1999.
18. **Fenton, Stephen J.**, "Laying the Foundation of an Automotive Product Liability Case Using Photogrammetry," American Trial Lawyers Association, 2003 Annual Convention, San Francisco, California, July 22, 2003.
19. **Fenton, Stephen J.**, "Photographs Help Reconstruct Princess Diana Crash," Illinois Association of Traffic Accident Investigators (IATAI) Newsletter, December 21, 1998.
20. **Fenton, Stephen J.**, "Reconstructing the Princess Diana Crash," Law Enforcement Technology, August 1998.
21. **Fenton, Stephen J.**, "Princess Diana Car Crash Animation," Digimation, Siggraph '98 3D software, 1998.
22. **Fenton, Stephen J.**, "Automotive Airbags," *Accident Investigation Quarterly*, Issue 16, Fall 1997.
23. **Fenton, Stephen J.**, "[Accident Scene Diagramming Using New Photogrammetric Technique](#)," Society of Automotive Engineers (SAE) paper 970944, 1997.
24. **Fenton, Stephen J.**, "Operations Manual - Surveying Operations," Peter Kiewit Sons', Inc, 1993.

Committee Publications

1. SAE Accident Investigation and Reconstruction Practices Committee, Joe Marsh, Sponsor, "Reaffirmation of J1301 – Truck Deformation Classification," Society of Automotive Engineers (SAE) J1301.
2. SAE Accident Investigation and Reconstruction Practices Committee, Joe Marsh, Sponsor, "Reaffirmation of J224 – Collision Deformation Classification," Society of Automotive Engineers (SAE) J224.
3. SAE Accident Investigation and Reconstruction Practices Committee, John Marcosky, Sponsor, "Ethics for Accident Investigation and Reconstruction," Society of Automotive Engineers (SAE) J2314.
4. SAE Accident Investigation and Reconstruction Practices Committee, "Equidistant Crush Measurement Techniques," Society of Automotive Engineers (SAE) J2433, In Press.

Grants and Funded Research

1. "A Method to Quantify Vehicle Dynamics and Deformation for Vehicle Rollover Tests Using Camera-Matching Video Analysis," funded, in part, by **Ford Motor Company**, 2007.
2. "Image Analysis of Rollover Crash Test Using Photogrammetry," funded, in part, by **Ford Motor Company**, 2005-06.
3. "Chimney Rock Preservation and Access Project," Awarded Grant, **Colorado Historical Society**, Grant #96-02-104.
4. "Photogrammetric Ruin Documentation Project," Awarded Grant, **Colorado Historical Society**, Grant #96-01-095.
5. "Survey and Documentation of Paraboloid at Zeckendorf Plaza," Awarded Grant, **Colorado Historical Society**, 1995 Mini Grant.

Presentations and Courses Taught

1. "Effectively Packaging and Presenting Complex Accident Reconstruction Concepts", Presented at the American Bar Association 2014 Emerging Issues in Motor Vehicle Product Liability Litigation Conference, Phoenix, AZ, April 3, 2014.
2. "Utilizing Today's Technology in Reconstructing Accidents", Presented at the American Bar Association 2012 Emerging Issues in Motor Vehicle Product Liability Litigation Conference, Phoenix, AZ, March 29, 2012.
3. "Determining Driver Error from Tire Marks and Quantifying the Severity of Highway Barrier Collisions," California Department of Transportation Tort Conference, San Diego Hilton, May 21, 2009.

4. "Rollovers and Guardrail Impacts", California Department of Transportation, Los Angeles, CA, August 7, 2007.
5. "When the Traffic Collision Report is of No Help", California Department of Transportation, Santa Barbara, CA, May 24, 2007.
6. "Accident Reconstruction and Animation in Rollover Cases", Mercedes-Benz, San Francisco, CA, May 4, 2007.
7. Accident Investigation Methods, Mercedes and DaimlerChrysler, Tokyo, Japan, February 9, 2007.
8. Accident Investigation Methods, Mercedes and DaimlerChrysler, Seoul, South Korea, February 7, 2007.
9. Handling, Stability and Rollovers, Ford Motor Company, Detroit, MI, July 31 through August 2, 2006.
10. "The Admissibility of Computer Simulations and Animations in Trial", Presented at the Association of Southern California Defense Counsel (ASCDC) 2005 Products Liability Meeting, Los Angeles, CA, November 3, 2005.
11. "Using Photogrammetric Animations to Effectively Present Your Accident Reconstruction to the Jury", Presented at the American Bar Association 2005 Emerging Issues in Motor Vehicle Product Liability Litigation Conference, Phoenix, AZ, March 31, 2005.
12. Course in Close-Range Photogrammetry, Presented at SAE World Congress, March, 2003.
13. Presentation on Close-Range Photogrammetry, Society of Automotive Engineers, Phoenix, 2002.
14. "Determining Crash Data Using Camera Matching Photogrammetric Technique", Presented at the Society of Automotive Engineers' International Body Engineering Conference & Exhibition (IBEC) and The Automotive & Transportation Technology Congress (ATT), in Paris France on July 11, 2002; paper number 2001-01-3313.
15. "Integrating Monte Carlo Simulation, Momentum-Based Impact Modeling, and Restitution Data to Analyze Crash Severity", Presented at the Society of Automotive Engineers' International Body Engineering Conference & Exhibition (IBEC) and The Automotive & Transportation Technology Congress (ATT), in Paris France on July 11, 2002; paper number 2001-01-3313.
16. "Technology in Product Liability Cases", Speaker, 2000 CDLA annual conference in Steamboat Springs, Colorado, August 19, 2000.
17. "State of the Art Technologies in Accident Reconstruction", Speaker, National Association of Independent Insurance Adjusters 63rd Annual Convention, Keystone, Colorado, May 25, 2000
18. "Distal Lower Extremity Fractures", Contributed Video Simulation Production, Member - San Diego CIREN team, CIREN Quarterly Meeting, Washington, D.C., May 5, 2000.
19. "Accident Reconstruction Techniques and Practices", Society of Automotive Engineers, Colorado Section Meeting, Knott Laboratory Media Center, January 19, 2000
20. "The Role of Computers in Accident Reconstruction", Knott Laboratory, Inc., Englewood, Colorado, October 26, 1999.
21. "New Technologies in Accident Reconstruction", Colorado Defense Lawyer's Association Conference, Vail, Colorado, August 13-14, 1999.
22. "New Technologies in Accident Reconstruction", Wyoming Trial Lawyer's Association Conference, Jackson Hole, Wyoming, June 16, 1999.
23. "Courtroom Use of Photogrammetry", Knott Laboratory, Inc., Denver, Colorado, April 15, 1999.
24. "Using Digital Photogrammetry to Determine Vehicle Crush & Equivalent Barrier Speed (EBS)", Society of Automotive Engineers (SAE), International Congress & Exposition, Accident Reconstruction Session, Cobo Hall, Detroit, Michigan, March 2, 1999.
25. "Photogrammetric Reconstruction," Attorneys Information Exchange Group, Air Bag Summit, Kansas City, Missouri, May 17, 2002.
26. "State-of-the-Art Technology in Accident Reconstruction", Montgomery, Little and McGrew Law Firm, Denver, Colorado, February 26, 1999.
27. "Princess Diana Accident Reconstruction: A Case Study Utilizing Photogrammetry and Computer Animation", Northeastern University Law Enforcement Exposition, Boston, MA, November 17-18, 1998.
28. "Vehicular Accident Reconstruction-Case Studies and Future Technologies", Allstate Insurance Company, Englewood, Colorado, November 11, 1998.

29. "Vehicular Accident Reconstruction as it Relates to Parking Lot and Low Speed Accidents", Allstate Claim Service, Highlands Ranch, Colorado, October 15, 1998.
30. "Accident Reconstruction: State-of-the-Art Technology", Knott Laboratory, Inc., Denver, Colorado, October 7, 1998.
31. "State-of-the-Art Technology in Accident Reconstruction", Colorado Claims Association Annual Seminar, Englewood, Colorado, October 2, 1998.
32. "Auto Litigators at Dawn: Reconstructing the Princess Di Automobile Crash", Colorado Trial Lawyers Association (CTLA) 1998 Annual Convention, Steamboat Springs, Colorado, July 30-August 2, 1998.
33. "Product Liability", Knott Laboratory, Inc., Denver, Colorado, April 9, 1998.
34. "Photogrammetry & Animations", Colorado Trial Lawyers Association, CLE Spring Training Seminar, Tucson, Arizona, March 20, 1998.
35. "Seat Belts and Airbags: Current Technology", Knott Laboratory, Inc., Denver, Colorado, March 19, 1998.
36. "State-of-the-Art Techniques in Forensic Engineering", Mile High Optimists Club, The University Club, Denver, Colorado, March 5, 1998.
37. "Computer Animation and Photogrammetry", Paul S. Edwards & Associates, Colorado Springs, Colorado, February 13, 1998.
38. "Photogrammetric Accident Reconstruction", Colorado Bar Association, Colorado Springs, Colorado, January 15, 1998.
39. "Discovery Magazine – Science Behind the Headlines" Documentary, Discovery Channel, November 11, 1998.
40. "Date Line NBC – Princess Diana Accident", Guest Presenter, Television News Magazine, NBC, October 1997.
41. "Low Speed Accident Investigation", Knott Laboratory, Inc. Denver, Colorado, October 18, 1997.
42. "Seat Belt and Airbag Investigation", Knott Laboratory, Inc., Denver, Colorado October 16, 1997.
43. "Accident Reconstruction - Accident Scene Diagramming Using New Photogrammetric Technique", Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, February 27, 1997.
44. "Forensic Animation", Nebraska Association of Trial Attorneys, Omaha, Nebraska, August 1996.
45. "Forensic Animations - How to control costs, hire a credible engineer, and use animations as demonstrative evidence", Colorado Bar Association - Technical Division Meeting, Denver, Colorado, March 1, 1995.
46. "Forensic Animation", First Judicial Bar Association, Jefferson County Courthouse, Golden, Colorado, February 13, 1995.
47. "Forensic Photogrammetry", Nebraska State Attorney's Office, Omaha, Nebraska, May 1994.

Technical Conferences and Seminars

1. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2013.
2. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2011.
3. Bosch Crash Data Retrieval (CDR) System® Level 1 and Level 2 Technician Course, Kineticorp, LLC, Greenwood Village, CO, March 8, 2011.
4. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2010.
5. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2009.

6. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2008.
7. "FMVSS No. 126 ESC Compliance Test Procedure Technical Workshop & Demonstration" Presented by the National Highway Traffic Safety Administration at TRC, November 7, 2007.
8. SAE Motor Vehicle Fire Investigation Task Force Meeting, Detroit, MI, April, 2007
9. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Detroit, Michigan, April, 2007.
10. CIREN Case Review, Multidisciplinary Meeting, University of Michigan, April 4, 2007
11. CIREN Case Review, Multidisciplinary Meeting, University of Michigan, October 20, 2006.
12. Handling, Stability and Rollovers, Ford Motor Company, Detroit, MI, July 31 through August 2, 2006.
13. Brake Certification Seminar, Colorado Motor Carriers Association, July 27, 2006.
14. CIREN Case Review, Multidisciplinary Meeting, University of Michigan, May 24, 2006.
15. Accident Reconstruction Symposium, Society of Automotive Engineers (SAE), Ventura, CA, November 8-9, 2005.
16. CIREN Case Review, Multidisciplinary Meeting, University of Michigan, November, 2005.
17. SAE Motor Vehicle Fire Investigation Task Force Meeting, Detroit, MI, April, 2005.
18. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, April, 2005.
19. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, March, 2004.
20. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, March 3-6, 2003.
21. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, March 5-7, 2002.
22. SAE World Congress by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, March 5-8, 2001.
23. "Distal Lower Extremity Fractures", Video Simulation Production, Member - San Diego CIREN team, CIREN Quarterly Meeting, Washington, D.C., May 5, 2000.
24. PC-Crash & PC-Rectification Training Workshop, New Horizons Computer Center, Detroit, Michigan, March 3-4, 1999.
25. Technical Standards Committee Meeting on Engineering Ethics, Committee Member, Detroit, Michigan, March 2, 1999.
26. Value For Our World: The Innovation Challenge, Seminar by Society of Automotive Engineers (SAE), International Congress of Exposition, Cobo Hall, Detroit, Michigan, March 1-4, 1999.
27. Global Technology Partnering: Accident Reconstruction and Occupant Protection and Injury Assessment in the Automotive Crash Environment, seminar by Society of Automotive Engineers (SAE), International Congress and Exposition, Cobo Hall, Detroit, Michigan, February 26-27, 1997.

RATE SHEET

6070 Greenwood Plaza Blvd., Suite 200
 Greenwood Village, CO 80111
 Tel: 303.733.1888
 Fax: 303.733.1902
 www.kinetiCorp.com

	Hourly Rate
Stephen J. Fenton	\$ 425.00
William T.C. Neale	\$ 290.00
Nathan A. Rose	\$ 280.00
David A. Danaher	\$ 255.00
Gray Beauchamp	\$ 255.00
William M. Bortles	\$ 215.00
Toby M. Terpstra	\$ 205.00
Neal R. Carter	\$ 205.00
James P. Marr	\$ 190.00
Dana E. Thornton	\$ 190.00
David R. Hessel	\$ 185.00
Jordan A. Dickinson	\$ 175.00
Alireza Hashemian	\$ 150.00
David A. Pentecost	\$ 150.00
Sean M. McDonough	\$ 145.00
George Rayburn	\$ 145.00
Daniel T. Koch	\$ 140.00
Martin W. Randolph	\$ 135.00
Steven M. Beier	\$ 135.00
Connor A. Smith	\$ 135.00
Andrew Donaldson	\$ 130.00
Justin L. Holderness	\$ 130.00
Tomas J. Owens	\$ 125.00
Seth H. Miller	\$ 125.00
Robert N. Gillihan	\$ 125.00
Nathan McKelvey	\$ 125.00
Raul N. Tackie	\$ 115.00
Nicholas Sousa	\$ 115.00
Eric King	\$ 110.00

Mileage: 54.5¢ per mile

Rates subject to change without notice

Expert Testimony For Mr. Stephen Fenton, P.E.

Date Testified	Trial	Hrng	Arb	Depo	Job Number	Job Name	Description	Case No.	Dist/City/State
2014									
1/9/2014				X	2036-0213	Smith	Wener v. State of California Dept. of Transportation	CV 175878	Superior Court of the State of California, For the County of Santa Cruz
1/14/2014				X	2034-0213	Smith	Stilson v. ACCO Management Co.	111CV208040	Superior Court of the State of California, For the County of Santa Clara
1/23/2014	X				1619-0910	Schmidt	Mercado v. State of California Dept. of Transportation	HG09486029	Superior Court of the State of California, For the County of Alameda
2/27/2014				X	1439-0909	Hawley	Rodriguez, Delia v. Carcamo, Oscar	S-1500-CV-268379-SPC	Superior Court of the State of California, For the County of Kern
3/14/2014				X	1682-0111	Bassett	Hope/White v. United Parcel Services	2011-CA-005747	Circuit Court of the Fourth Judicial Circuit, For Duval County, Florida
3/20/2014	X				1784-0811	Mackay	Dunlop v. Esurance; Folsom Lake Ford	34-2008-00019350	Superior Court of the State of California, For the County of Sacramento
6/27/2014	X				2152-0913	Low	Cortez v. State of California Dept. of Transportation	DR120256	Superior Court of the State of California, For the County of Humbolt
7/9/2014				X	2042-0213	Jansma	Brown/Martin v. Cooper Tire & Rubber Co.	C2012091	Superior Court of the State of Arizona, For the County of Pima
7/28/2014				X	1942-0812	Owens	Walden v. Chrysler Group	12CV472	Superior Court of the Decatur County, For the State of Georgia
7/30/2014				X	1849-0112	Moreno	Chen v. TBE International	BC469935	Superior Court of the State of California, For the County of Los Angeles
11/11/2014				X	2266-0414	Beans	Bacho v. Rough Country, LLC	3:14-cv-40-TCB	United States District Court For the Northwestern District of Georgia, Newnan Division
11/21/2014				X	1318-0608	Law	Verduzco v. Ford Motor Company	615207	Superior Court of the State of California, For the County of Stanislaus
11/24/2014	X				2036-0213	Smith	Wener v. State of California Dept. of Transportation	CV 175878	Superior Court of the State of California, For the County of Santa Cruz
Year Count	4	0	0	9					
2015									
1/15/2015				X	2136-0813	Yeager	Dade v. State of CA	CIVDS1303736	Superior Court of the State of California, For the County of San Bernardino
1/29/2015				X	2046-0313	Schultz	Anton v. General Motors, LLC	CV 2012-017597	Superior Court of the State of Arizona, For the County of Maricopa
2/20/2015				X	1318-0608	Law	Verduzco v. Ford Motor Company	615207	Superior Court of the State of California, For the County of Stanislaus
3/2/2015	X				2111-0713	Gibson	Edwards v. Ford Motor Company	CV12-10994 PA (AGRx)	United States District Court, Central District of California
3/20/2015	X				1318-0608	Law	Verduzco v. Ford Motor Company	615207	Superior Court of the State of California, For the County of Stanislaus
3/31/2015	X				1942-0812	Owens	Walden v. Chrysler Group	12CV472	Superior Court of the Decatur County, For the State of Georgia
4/14/2015				X	2246-0314	Low	Stoll, Bryn v. State of CA	CGC-13-532478	Superior Court of the State of California, For the County of San Francisco
4/21/2015	X				1849-0112	Moreno	Chen v. TBE International	BC469935	Superior Court of the State of California, For the County of Los Angeles
4/28/2015				X	1229-0907	Dorman	Ruiz v. Kia	06-06281	District Court of Dallas County, Texas
4/30/2015				X	2263-0414	Cox	Tafoya v. Quality Pontiac/GM	D-412-CV-2012-00055	Fourth Judicial District Court, County of San Miguel, State of New Mexico
5/7/2015				X	2017-0113	Smith	Thibadeau v. State of CA	1-12-CV-234911	Superior Court of the State of California, For the County of Santa Clara
6/1/2015	X				2017-0113	Smith	Thibadeau v. State of CA	1-12-CV-234911	Superior Court of the State of California, For the County of Santa Clara
6/18/2015	X				2136-0813	Yeager	Dade v. State of CA	CIVDS1303736	Superior Court of the State of California, For the County of San Bernardino
8/27/2015				X	1871-0212	Lonnie	Templeton v. Hyundai	11CECG04207	Superior Court of the State of California, For the County of Fresno
9/11/2015				X	1682-0111	Bassett	Hope/White v. United Parcel Services	2011-CA-005747	Circuit Court of the Fourth Judicial Circuit, For Duval County, Florida
11/3/2015				X	2263-0414	Cox	Tafoya v. Quality Pontiac/GM	D-412-CV-2012-00055	Fourth Judicial District Court, County of San Miguel, State of New Mexico
12/10/2015				X	2305-0614	Arko	Kent Ma v. Southern California Edison	30-2014-00734956-CU-PA-CJC	Superior Court of the State of California, For the County of Orange
12/17/2015				X	2418-1114	Darbyshire	Wilden v. Laury Transportation, LLC, et al	3:13CV00784-H	United States District Court Western District of Kentucky Louisville Division
Year Count	6	0	0	12					
2016									
2/26/2016				X	1451-1009	Moy	Wolkoff v. State of California	CIV 481154	Superior Court of the State of California For the County of San Mateo
3/21/2016				X	2547-0515	Cole	Bailey v. Berman	24-C-15-001986	Circuit Court for Baltimore City in and for the State of Maryland
4/15/2016				X	2640-0915	Newton	Tirre v. Melton, et al.	D-307-CV-2015-00295	State of New Mexico County of Dona Ana Third Judicial District Court
4/18/2016				X	1451-1009	Moy	Wolkoff v. State of California	CIV 481154	Superior Court of the State of California For the County of San Mateo
4/26/2016	X				1451-1009	Moy	Wolkoff v. State of California	CIV 481154	Superior Court of the State of California For the County of San Mateo
7/7/2016				X	2231-0314	Low	Moore v. State of California	DR120609	Superior Court of the State of California For the County of Humboldt



Date Testified	Trial	Hrng	Arb	Depo	Job Number	Job Name	Description	Case No.	Dist/City/State										
7/19/2016	X				2547-0515	Cole	Bailey v. Berman	24-C-15-001986	Circuit Court for Baltimore City in and for the State of Maryland										
7/28/2016				X	2148-0913	Goodman	Thompson v. Hankook Tire Co.	2:14-cv-00295-CG-M	United States District Court for the Southern District of Alabama Northern Division										
8/9/2016	X				1927-0612	Huelskoetter	Kramer v. Ford Motor Company	0:12-cv-01149-SRN-FLN	United States District Court, District of Minnesota										
11/8/2016	X				2645-0915	Spencer	Brockman v. Takata	2015CV32157	District Court, County of Denver, State of Colorado										
11/21/2016				X	2963-1016	Abron	Freeman v. Mamo Logistics, et al	HG14750141	Superior Court of California, County of Alameda										
12/1/2016				X	1815-1011	Loomer	Robbins v. Ford Motor Company	4:15CV1360HEA	District Court, Eastern District of Missouri, Eastern Division										
12/7/2016				X	2963-1016	Abron	Freeman v. Mamo Logistics, et al	HG14750141	Superior Court of California, County of Alameda										
Year Count	4	0	0	9															
2017																			
1/4/2017	X				2231-0314	Low	Moore v. State of California	DR120609	Superior Court of the State of California For the County of Humboldt										
1/31/2017				X	2884-0716	Loomer	Taber v. Ford Motor Company	4:16-cv-00162SWH	United States District Court, Western District of Missouri, Western Division										
3/7/2017				X	2706-1115	Owens	Juana Rodriguez v. Chrysler Group, LLC	2015-CP-04-00134	Court of Common Pleas, Anderson County, South Carolina										
3/16/2017				X	2739-0116	Platt	Anderson v. Ford Motor Company	C20150922	Superior Court of Arizona, Pima County										
4/6/2017				X	2621-0815	Baggs	Davila v. State of California	BC558621	Superior Court for the State of California, County of Los Angeles										
4/11/2017				X	1860-0112	Pratt	deWit v. UPS	1:16-cv-00036-MW-GRJ	District Court, Northern District of Florida, Gainesville Division										
5/3/2017				X	2271-0414	Cavanaugh	FedEx Freight Vehicle Collision Cases	4788	Superior Court of the State of California, County of Los Angeles, Central Civil West										
9/8/2017				X	3125-0517	Cooney	Dakota Wilkins v. Vitale and General Motors, LLC	15JE-CC00705	Twenty-Third Judicial Circuit Court of Jefferson County, Missouri										
11/14/2017				X	3201-0717	Ansa	Sarabia-Sanchez v. UPS	BC617428	Los Angeles Superior Court										
11/16/2017				X	2971-1016	Spear	Mercado v. State of California Dept. of Transportation	HG09486029	Superior Court of California, County of Alameda										
12/14/2017	X				2971-1016	Spear	Mercado v. State of California Dept. of Transportation	HG09486029	Superior Court of California, County of Alameda										
Year Count	2	0	0	9															
2018																			
2/14/2018				X	3149-0617	Cardelli	Butler v. Wordl Class Automotive Operations, Inc. (Planet Ford)	17-69-NI	State of Michigan in the Circuit Court for the County of Mason										
5/24/2018				X	3187-0717	Law	Rhodehouse v. Ford	2:16-cv-01892-JAM-CMK	United States District Court Eastern District of California										
9/11/2018				X	3407-0318	Moreno	Estarella v. West Coast Ambulance Corporation, et al.	BC527749	Superior Court of the State of California for the County of Los Angeles										
9/19/2018				X	2929-0916	Shay	Gonzalez v. Shooshani Developers, LLC	BC600771	Superior Court of the State of California, County of Los Angeles										
10/9/2018				X	3407-0318	Moreno	Estarella v. West Coast Ambulance Corporation, et al.	BC527749	Superior Court of the State of California for the County of Los Angeles										
11/2/2018				X	2518-0415	Hirsch	Liu, et al v. U-Haul, et al	17-CV-1096-BRM-LHG	United States District Court for the District of New Jersey										
12/13/2018				X	3208-0817	Fowler	Collins v. Barragan and State of California Dept. of Transportation	56-2016-00484371-CU-PA-VTA	Superior Court of The State of California, County of Ventura										
Year Count	0	0	0	7															
2019																			
1/29/2019				X	3540-0718	Slobin	Didier v. FCA UA, LLC	4:18-cv-98	United States District Court for the Eastern District of Texas, Sherman Division										
3/12/2019				X	3311-1217	Frazier	Teresa Herron v. Monroe Motorsports, Inc.	17 -015068-NO	State of Michigan in the Circuit Court for the County of Wayne										
Year Count	0	0	0	2															
Total for Mr. Fenton since 2014																			
<table><tr><td>Trial</td><td>Hrng</td><td>Arb</td><td>Depo</td><td>Total Times Testified</td></tr><tr><td>16</td><td>0</td><td>0</td><td>48</td><td>64</td></tr></table>										Trial	Hrng	Arb	Depo	Total Times Testified	16	0	0	48	64
Trial	Hrng	Arb	Depo	Total Times Testified															
16	0	0	48	64															